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6
7 UNITED STATES DISTRICT COURT FOR THE
8 WESTERN DISTRICT OF WASHINGTON
9 AT SEATTLE

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 \$13,000 IN U.S. CURRENCY, AND ANY
14 ACCRUED INTEREST,

15 Defendant.

16 CASE NO. CV20-1685

17
18 **VERIFIED COMPLAINT
19 FOR FORFEITURE *IN REM***

20 **I. NATURE OF THE ACTION**

21 1. This is a civil *in rem* action for the forfeiture of \$13,000 in U.S. currency
22 seized by the U.S. Postal Inspection Service from U.S. Postal Service Priority Mail Parcel
23 #9505 5121 1722 0148 3448 13 on June 4, 2020 in Tukwila, Washington (hereafter, the
24 “Defendant Currency”).

25 **II. LEGAL BASIS FOR FORFEITURE**

26 2. The Defendant Currency is forfeitable pursuant to 21 U.S.C. § 881(a)(6) for
27 violations of 21 U.S.C. §§ 841(a)(1) (distribution of controlled substances) and 846
28 (attempt or conspiracy to distribute controlled substances). Specifically, counsel for the
United States has a reasonable belief the government will be able to prove, to a

1 preponderance at trial, that the Defendant Currency represents proceeds from the sale
 2 controlled substances and/or moneys furnished for the purchase of controlled substances.
 3

4 III. JURISDICTION AND VENUE

5 3. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1345
 6 (United States is plaintiff) and 1335(a) (action for forfeiture).
 7

8 4. Venue is proper in this Court pursuant to 28 U.S.C. § 1335(b)(1)(A) (acts
 9 giving rise to the forfeiture occurred in this district).
 10

11 5. Pursuant to a seizure warrant issued in Western District of Washington
 Cause No. MJ20-308 and executed on June 4, 2020, the U.S. Postal Inspection Service
 took custody of the Defendant Currency, and it remains in that agency's custody.
 12

13 6. As provided in Supplemental Rule G(3)(b)(i), the Clerk of Court is required
 14 to issue a warrant to arrest the Defendant Currency if it is in the government's possession,
 custody, or control. As such, the Court will have *in rem* jurisdiction over the Defendant
 15 Currency when the accompanying Warrant of Arrest *in Rem* is issued, executed, and
 returned to the Court.
 16

17 IV. FACTUAL BASIS FOR FORFEITURE

18 7. On June 1, 2020, while conducting parcel interdiction operations at Postal
 19 facilities in the Western District of Washington, Postal Inspectors identified U.S. Priority
 20 Mail Parcel #9505 5121 1722 0148 3448 13 (hereafter, "the Parcel") as suspicious for
 21 containing controlled substances and/or proceeds from the sale of controlled substances.
 22

23 8. The Parcel was heavily taped. Those who distribute controlled substances
 24 through the U.S. mail often use excessive tape on their parcels, both in an effort to
 conceal any drug-related scent that might emanate from the parcel and to make the parcel
 25 less susceptible to tampering. A photograph of the exterior of the Parcel is included
 below.
 26



9. The address label was handwritten and reflected the Parcel had been sent from one private individual to another. Those who distribute controlled substances through the U.S. mail often handwrite their mailing labels, rather than using pre-printed labels. Those who distribute controlled substances through the U.S. mail do not typically use labels that reflect a business entity or a corporate shipping account. A photograph of the mailing label is included below.



10. The address label reflected the Parcel had been sent to "P. Harshaw" at 17636 Highway 20, Burlington, WA 98233. A check of U.S. Postal Service databases reflected that an individual named "Patrick Harshaw" is, in fact, associated with that address in Washington.

1 11. The address label reflected the Parcel had been sent by "D. Harshaw" at 66
 2 Summit St., Blue Ridge, GA 30513. A check of U.S. Postal Service databases reflected
 3 there is no individual by that name associated with that Georgia address. Instead, the
 4 databases reflected that the individuals associated with that address are Danny Mitchell
 5 and Kaitlyn Mitchell. Those who distribute controlled substances through the U.S. mail
 6 often use fictitious names on the address labels, in an effort to avoid identification by law
 7 enforcement.

8 12. The postage label reflected the Parcel had been mailed from a post office in
 9 zip code 30540, in the vicinity of Ellijay, Georgia. Ellijay is approximately 30 miles from
 10 Blue Ridge, the city reflected in the return address on the mailing label. Those who
 11 distribute controlled substance through the U.S. mail often mail their parcels from a post
 12 office that is some distance from the return address, in an effort to avoid law enforcement
 13 detection. A photograph of the postal label is included below.



23 13. The Parcel carried \$44.55 in postage. A check of U.S. Postal Service
 24 databases reflected the postage had been paid in cash. Those who distribute controlled
 25 substances through the mail often pay for postage with cash, because a credit card or
 26 business account number would make it easier for law enforcement to identify the sender.
 27
 28

1 14. Based on these suspicious features, Postal Inspectors requested the
 2 assistance of Tukwila Police Department Detective James Sturgill and his narcotics-
 3 detecting K-9 Apollo at the mail processing facility in Tukwila, Washington. Detective
 4 Sturgill directed Apollo to search a warehouse at that facility. Apollo did not alert to the
 5 scent of narcotics anywhere in the warehouse.

6 15. Thereafter, Postal Inspectors, working outside the view of Detective
 7 Sturgill and Apollo, placed the Parcel inside that cleared warehouse. Once the Parcel was
 8 placed, Detective Sturgill directed Apollo to begin searching the warehouse. When
 9 Apollo approached the Parcel, he alerted to the scent of narcotics emanating from it – i.e.,
 10 he stopped, took several deep sniffs, and sat.

11 16. Individuals who handle controlled substances often leave the scent of those
 12 substances on shipping boxes and other packaging materials they handle. Packaging
 13 materials are also often stored in close proximity to controlled substances that then
 14 transfer their odor to those materials. Narcotics-detecting K-9s are trained to alert to the
 15 scent of controlled substances.

16 17. After this positive K-9 alert, Postal Inspectors applied for a warrant to
 17 search the Parcel. That warrant issued on June 3, 2020 in Western District of Washington
 18 Cause No. MJ20-308, and Postal Inspectors executed it on June 4, 2020.

19 18. Inside the Parcel, Postal Inspectors found a second cardboard box that was
 20 also heavily taped. Photographs of the interior box are included below.



1 19. Inside the interior box, Postal Inspectors found wadded newspapers, a few
 2 magazines, including a back issue of "Cannabis" magazine, and five cheap paperback
 3 books that had been vacuum sealed inside plastic bags. Photographs are included below.



23 ///

24 ///

1 20. Postal Inspectors opened the vacuum-sealed paperbacks and found currency
2 hidden between the pages of each one. Photographs are included below.



1 21. Individuals who distribute controlled substances, and send the proceeds of
 2 that distribution, through the U.S. mail often vacuum-seal the contents of their parcels in
 3 an effort to hide the scent of controlled substances and to defeat any narcotics-detecting
 4 dog that may be applied to the parcels.

5 22. There were no notes, receipts, or instructions included with the vacuum-
 6 sealed currency, or anywhere in the Parcel. Parcels containing personal gifts or reflecting
 7 legitimate business transactions typically include this type of material with any monetary
 8 instruments. Individuals who distribute controlled substances, and send the proceeds of
 9 that distribution, through the U.S. mail, however, rarely include in their parcels any
 10 explanatory information as to the source or purpose of the proceeds.

11 23. The currency totaled \$13,000 and was comprised largely of \$20 bills – i.e.,
 12 in total there were 200 \$20 bills and 90 \$100 bills. Those who distribute controlled
 13 substances typically use low-denomination bills to conduct their business. For that
 14 reason, \$20 bills are the most common bills found in seizures of narcotics-related
 15 currency from the U.S. mail.

16 24. The U.S. Postal Inspection Service seized the Defendant Currency for
 17 administrative forfeiture pursuant to 19 U.S.C. §§ 1607 – 1609, by way of 21 U.S.C.
 18 § 881(d) and 18 U.S.C. § 981(d), on the grounds it constitutes proceeds of the distribution
 19 of controlled substances, or moneys furnished for the purchase of controlled substances,
 20 in violation of 21 U.S.C. §§ 841 and 846.

21 25. On June 29, 2020, the U.S. Postal Inspection Service sent notice of the
 22 seizure to all identified potentially interested parties, as required by 18 U.S.C.
 23 § 983(a)(1).

24 26. On August 17, 2020, the U.S. Postal Inspection Service received an
 25 administrative claim to the Defendant Currency from Patrick Harshaw, the identified
 26 recipient for the Parcel. In his claim, Mr. Harshaw asserted the Defendant Currency
 27 reflects the repayment of a loan he made to a friend. He also asserted he was “willing to
 28 submit any needed documentation if requested.”

27. On November 3, 2020, counsel for the United States spoke with Mr. Harshaw on the telephone and invited him to submit documentation in support of his administrative claim. The following day, counsel for the United States sent him a short list of information and documents that would be helpful in evaluating his claim – i.e., information and documents related to the asserted loan. As of the date of this filing, Mr. Harshaw has not provided that information or communicated further with counsel for the United States.

28. Patrick Harshaw is a current or former employee at “The High End,” a state-licensed marijuana producer located in Burlington, Washington. The public address for the The High End is 17636 Highway 20, Burlington, WA 98233 – the same address to which the Parcel containing the Defendant Currency was sent, c/o Patrick Harshaw. Mr. Harshaw has significant criminal history that includes multiple drug convictions, including convictions for possession of marijuana and cocaine.

29. Danny Mitchell, one of the individuals associated with the sending address in Georgia, has significant criminal history that includes convictions for distribution of, and possession with intent to distribute, controlled substances.

30. Kaitlyn Mitchell, the other individual associated with the sending address in Georgia, has a conviction for possession of marijuana.

31. The sale and possession of recreational marijuana remains illegal in Georgia, the state from which the Parcel containing the Defendant Currency was shipped.

V. REQUEST FOR RELIEF

As required by Supplemental Rule G(2)(f), the facts set forth in this Verified Complaint support a reasonable belief that the United States will be able to meet its burden of proof at trial. More specifically, these facts support a reasonable belief that the United States will be able to prove, at trial, that the Defendant Currency constitutes proceeds of the distribution of controlled substances and/or moneys furnished for the

1 purchase of controlled substances, in violation of 21 U.S.C. §§ 841 and 846, which
2 renders it forfeitable pursuant to 21 U.S.C. § 881(a)(6).

3 WHEREFORE, the United States respectfully requests:

- 4 1. A warrant issue for the arrest of the Defendant Currency;
- 5 2. That due notice be given to all interested parties to appear and show cause
6 why the Defendant Currency should not be forfeited;
- 7 3. The Defendant Currency be forfeited to the United States for disposition
8 according to law; and,
- 9 4. For such other and further relief as this Court may deem just and proper.

10 DATED this 16th day of November, 2020.
11

12 Respectfully submitted,
13

14 BRIAN T. MORAN
United States Attorney
15

16 
17

18 MICHELLE JENSEN
19 Assistant United States Attorney
United States Attorney's Office
20 700 Stewart Street, Suite 5220
Seattle, Washington 98101
(206) 553-2619
Michelle.Jensen@usdoj.gov
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VERIFICATION

I, Terry D. Stinson, am a Postal Inspector with the United States Postal Inspection Service in Seattle, Washington. I furnished the investigative facts contained in the foregoing Verified Complaint for Forfeiture *In Rem*. The investigative facts are based on personal knowledge I obtained from my involvement in the underlying investigation, my review of the relevant investigative material, other law enforcement officers involved in the investigation, other reliable official Government sources, and my own training and experience.

I hereby verify and declare, under penalty of perjury pursuant to 28 U.S.C. § 1746, that I have read the foregoing Verified Complaint for Forfeiture *In Rem*, that I know its contents, and that the facts it contains are true and correct to the best of my knowledge.

Executed this 16th day of November, 2020.

TERRY D. STINSON
Postal Inspector
United States Postal Inspection Service

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

UNITED STATES OF AMERICA

(b) County of Residence of First Listed Plaintiff _____
(EXCEPT IN U.S. PLAINTIFF CASES)(c) Attorneys (Firm Name, Address, and Telephone Number)
Michelle Jensen, Assistant United States Attorney
United States Attorney's Office, Asset Forfeiture Unit
700 Stewart Street, Suite 5220, Seattle, WA 98101-1271**DEFENDANTS**

\$13,000 IN U.S. CURRENCY, AND ANY ACCRUED INTEREST.

County of Residence of First Listed Defendant _____
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

<input checked="" type="checkbox"/> 1 U.S. Government Plaintiff	<input type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)
<input type="checkbox"/> 2 U.S. Government Defendant	<input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)
(For Diversity Cases Only)

	PTF	DEF	PTF	DEF	
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance	PERSONAL INJURY	PERSONAL INJURY	<input checked="" type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881	<input type="checkbox"/> 375 False Claims Act
<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 365 Personal Injury - Product Liability	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 376 Qui Tam (31 USC 3729(a))
<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 367 Health Care/ Pharmaceutical Personal Injury	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 400 State Reapportionment
<input type="checkbox"/> 140 Negotiable Instrument	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 330 Federal Employers' Liability	PROPERTY RIGHTS	<input type="checkbox"/> 410 Antitrust
<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 340 Marine	<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<input type="checkbox"/> 820 Copyrights	<input type="checkbox"/> 430 Banks and Banking
<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 345 Marine Product Liability	PERSONAL PROPERTY	<input type="checkbox"/> 830 Patent	<input type="checkbox"/> 450 Commerce
<input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans)	<input type="checkbox"/> 350 Motor Vehicle	<input type="checkbox"/> 370 Other Fraud	<input type="checkbox"/> 835 Patent - Abbreviated New Drug Application	<input type="checkbox"/> 460 Deportation
<input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits	<input type="checkbox"/> 355 Motor Vehicle	<input type="checkbox"/> 371 Truth in Lending	<input type="checkbox"/> 840 Trademark	<input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations
<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 380 Other Personal Property Damage	<input type="checkbox"/> 880 Defend Trade Secrets Act of 2016	<input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692)
<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<input type="checkbox"/> 385 Property Damage Product Liability	SOCIAL SECURITY	<input type="checkbox"/> 485 Telephone Consumer Protection Act
<input type="checkbox"/> 195 Contract Product Liability			<input type="checkbox"/> 861 HIA (1395ff)	<input type="checkbox"/> 490 Cable/Sat TV
<input type="checkbox"/> 196 Franchise			<input type="checkbox"/> 862 Black Lung (923)	<input type="checkbox"/> 850 Securities/Commodities/ Exchange
REAL PROPERTY	CIVIL RIGHTS	PRISONER PETITIONS		<input type="checkbox"/> 863 DIWC/DIWW (405(g))
<input type="checkbox"/> 210 Land Condemnation	<input type="checkbox"/> 440 Other Civil Rights	Habeas Corpus:	<input type="checkbox"/> 864 SSID Title XVI	<input type="checkbox"/> 890 Other Statutory Actions
<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 441 Voting	<input type="checkbox"/> 463 Alien Detainee	<input type="checkbox"/> 865 RSI (405(g))	<input type="checkbox"/> 891 Agricultural Acts
<input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 442 Employment	<input type="checkbox"/> 510 Motions to Vacate Sentence	FEDERAL TAX SUITS	<input type="checkbox"/> 893 Environmental Matters
<input type="checkbox"/> 240 Torts to Land	<input type="checkbox"/> 443 Housing/ Accommodations	<input type="checkbox"/> 530 General	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)	<input type="checkbox"/> 895 Freedom of Information Act
<input type="checkbox"/> 245 Tort Product Liability	<input type="checkbox"/> 445 Amer. w/Disabilities - Employment	<input type="checkbox"/> 535 Death Penalty	<input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 896 Arbitration
<input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 446 Amer. w/Disabilities - Other	Other:		<input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision
	<input type="checkbox"/> 448 Education	<input type="checkbox"/> 540 Mandamus & Other		<input type="checkbox"/> 950 Constitutionality of State Statutes
		<input type="checkbox"/> 550 Civil Rights		
		<input type="checkbox"/> 555 Prison Condition		
		<input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement		

V. ORIGIN (Place an "X" in One Box Only)

<input checked="" type="checkbox"/> 1 Original Proceeding	<input type="checkbox"/> 2 Removed from State Court	<input type="checkbox"/> 3 Remanded from Appellate Court	<input type="checkbox"/> 4 Reinstated or Reopened	<input type="checkbox"/> 5 Transferred from Another District (specify) _____	<input type="checkbox"/> 6 Multidistrict Litigation - Transfer	<input type="checkbox"/> 8 Multidistrict Litigation - Direct File
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Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
21 U.S.C. § 881(a)(6) for violations of 21 U.S.C. §§ 841(a)(1) and 846.**VI. CAUSE OF ACTION**Brief description of cause:
Seeking the civil forfeiture of proceeds from the sale of controlled substances and/or moneys furnished for the purchase of controlled substances**VII. REQUESTED IN COMPLAINT:** CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ CHECK YES only if demanded in complaint:
JURY DEMAND: Yes No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE _____ DOCKET NUMBER _____

DATE

SIGNATURE OF ATTORNEY OF RECORD

November 16, 2020

/s/ Michelle Jensen

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44**Authority For Civil Cover Sheet**

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

I.(a) Plaintiffs-Defendants. Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.

(b) County of Residence. For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)

(c) Attorneys. Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".

II. Jurisdiction. The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.
United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)

III. Residence (citizenship) of Principal Parties. This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.

IV. Nature of Suit. Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).

V. Origin. Place an "X" in one of the seven boxes.
Original Proceedings. (1) Cases which originate in the United States district courts.
Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441.
Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.
PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7. Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.

VI. Cause of Action. Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service.

VII. Requested in Complaint. Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.

VIII. Related Cases. This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

Date and Attorney Signature. Date and sign the civil cover sheet.

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7 UNITED STATES DISTRICT COURT FOR THE
8 WESTERN DISTRICT OF WASHINGTON
9 AT SEATTLE

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 \$13,000 IN U.S. CURRENCY, AND
14 ANY ACCRUED INTEREST,

15 Defendant.

16 CASE NO. CV20-1685

17
18 **WARRANT OF ARREST IN REM**

19 TO: UNITED STATES MARSHALS SERVICE
20 *and/or its duly authorized agents and representatives*

21 WHEREAS, a Verified Complaint for Forfeiture *in Rem* was filed in the above-
22 captioned action on November 16, 2020 alleging the defendant \$13,000 in U.S. currency
23 and any accrued interest (hereafter, “the Defendant Currency”) is subject to forfeiture to
24 the United States pursuant to 21 U.S.C. § 881(a)(6) for violations of 21 U.S.C.
25 §§ 841(a)(1) (distribution of controlled substances) and 846 (attempt or conspiracy to
distribute controlled substances); and,

26 WHEREAS, as reflected in the Verified Complaint, the Defendant Currency is in
27 the government’s possession, custody, and control;

1 YOU ARE, THEREFORE, HEREBY COMMANDED, pursuant to Supplemental
2 Rule G(3)(b)(i) of the Federal Rules of Civil Procedure, to arrest and seize the Defendant
3 Currency; and,

4 YOU ARE FURTHER COMMANDED that, after executing this arrest and
5 seizure, you promptly file a record so reflecting in this Court.

DATED this _____ day of November, 2020.

WILLIAM M. McCOOL
UNITED STATES DISTRICT COURT
CLERK

By: _____
DEPUTY CLERK

Presented by:

/s/ Michelle Jensen
MICHELLE JENSEN
Assistant United States Attorney
United States Attorney's Office
700 Stewart Street, Suite 5220
Seattle, WA 98101
(206) 553-2619
Michelle.Jensen@usdoj.gov

NOTE: This warrant is issued pursuant to Supplemental Rule G(3)(b)(i) of the Federal Rules of Civil Procedure (governing civil forfeiture actions in rem).

WARRANT OF ARREST IN REM - 2
U.S. v. \$13,000 in U.S. Currency, and Any Accrued Interest

UNITED STATES ATTORNEY
700 STEWART STREET, SUITE 5220
SEATTLE, WASHINGTON 98101
(206) 553-7970